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DEC 1 5 2021

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

| U. S. DISTRICT COURT EASTERN DISTRICT OF MO |
|--|
| ST. LOUIS |

| UNITED STATES OF AMERICA, |) | • |
|---------------------------|---|-----------------------|
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. S1-4:20CR0475 SRC |
| |) | |
| DALLAS CRAWFORD, |) | |
| |) | · |
| Defendant. |) | |

SUPERSEDING INFORMATION

COUNT II

The United States Attorney charges that:

At all times pertinent to the charges in this indictment:

- 1. Federal law defined the term
 - (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));
 - (b) "sexually explicit conduct" to mean actual or simulated--
 - (i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or
 - (v) lascivious exhibition of the genitals or pubic area of any person (18U.S.C. §2256(2)(A));

- (c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));
- (d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--
 - (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or
 - (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct (18 U.S.C. §2256(8)).
- 2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.
- 3. Between on or about September 29, 2018, and on or about November 1, 2018, in the Eastern District of Missouri, and elsewhere,

DALLAS J. CRAWFORD,

the defendant herein, did knowingly receive videos of child pornography over the internet, a means or facility of interstate commerce, and these videos were visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of a minor engaging

in sexually explicit conduct, including but not limited to: an October 4, 2018, video of minor female child "S.D." in a lascivious display of her genitals and a October 5, 2018 video of minor female child "S.D" in a lascivious display of her genitals.

In violation of Title 18, United States Code, Section 2252A(a)(2).

Respectfully submitted

SAYLER FLEMING United States Attorney

COLLEEN C. LANG #56872MC Assistant United States Attorney

| UNITED STATES OF AMERICA |) |
|------------------------------|---|
| EASTERN DIVISION |) |
| EASTERN DISTRICT OF MISSOURI |) |

I, Colleen Lang, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

COLLEEN LANG, #56872MO

Subscribed and sworn before me this $\frac{Q}{Q}$ day of December 2021.

CLERK, U.S. DISTRICT COURT

By: DEPUTY CLERK